

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JOHN DOE,

*

Plaintiff,

*

v.

* Civil Action No. _____

**UNIVERSITY OF MARYLAND,
COLLEGE PARK**

*

*

Defendant.

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DECLARATION OF JOHN DOE

Pursuant to 28 U.S.C. § 1746, I, John Doe, solemnly declare:

1. I am over the age of 18, competent, and have personal knowledge of the following facts.
2. Until my suspension on December 22, 2023, I was a fulltime undergraduate student at the University of Maryland, College Park (“College Park”). I have one semester of classes left to earn my degree.
3. Through my first three years at College Park, I maintained a 3.582 GPA.
4. I have been recognized on the dean’s list in four semesters.
5. Previously, I served as a volunteer for the Juvenile Diabetes Research Foundation.
6. In April 2023, I sat for the LSAT exam, scoring a 170.
7. Other than the disciplinary proceeding at issue in this lawsuit, I have not been the subject of any disciplinary action while at College Park.
8. I currently have a written offer of employment to work for one of the largest global medical technology companies in the world, which is set to commence upon my graduation.

9. As a result of my suspension, I will have to inform this employer that I will not be graduating on time. When the employer asks about the reason for the delay, I will have to disclose that I was suspended for sexual misconduct. I expect that disclosure will cause the employer to rescind the employment offer.

10. Additionally, my academic transcript will now reflect that I was subject to a disciplinary sanction, and my resume will reflect a one-year gap in my undergraduate education.

11. When prospective employers ask me about either the disciplinary sanction or gap in my resume, I will have to explain that I was suspended from College Park for sexual misconduct. I expect this disclosure will significantly limit my employment opportunities.

12. The disciplinary proceedings against me have lasted nearly a year. During that time, I have been allowed to attend classes in person and live on campus. At no point has College Park raised any concern about my presence on campus and I have done nothing that would create such a concern.

13. Nonetheless, while I maintain that I did not commit a sexual assault and pose no danger to the campus community, if the Court grants the injunctive relief I have requested and reinstates me as College Park student, I am willing to abide by certain limitations to address any safety concerns raised by College Park, such as attending classes remotely.

14. The initiation of this lawsuit and the underlying disciplinary proceeding has imposed a tremendous financial burden on me and my family, requiring us to incur tens of thousands of dollars in legal fees.

15. I am currently unemployed, and my mother, a single parent to me and my sibling, has been forced to take a second job waitressing to help with my mounting legal expenses.

16. The requirement that I post a security bond would impose an additional, significant financial hardship on me and my family. I therefore respectfully ask that the Court waive the bond requirement if it grants the injunctive relief I have requested.

17. In addition to financial hardship, the College disciplinary proceedings have also cause me to suffer significant emotional distress and social alienation. I have resigned from my fraternity; I have been approached by other students and called a rapist; I have received a death threat via text message; I was prohibited from patronizing a local restaurant; I have been told I am not welcome at my girlfriend's sorority; my sister, a high school student, has been harassed by other students at her school; and the emotional trauma from the experience has caused me to seek mental health counseling and negatively affected my physical health.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of December, 2023.

/s/ John Doe
John Doe